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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KWAME JOHN BELL,)	Case No.: 2:23-cv-02895-DMC
)	
Plaintiff,)	STIPULATION AND ORDER FOR AN
)	EXTENSION OF TIME
vs.)	
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from June 13, 2024, up to and including July 15, 2024. This is the Defendant's first request for an extension.

Defendant requests this extension in good faith and with good reason. Defendant's undersigned counsel currently has three other district court briefs due the same week as this case. In addition to briefing cases, the undersigned counsel for the Commissioner has been tasked with additional duties specific to answering new complaints, with 17 such assignments he has completed for the prior two weeks, which have resulted in five voluntary remands. He therefore

1 seeks an extension to allow more time to review the record in this case and respond appropriately
2 to Plaintiff's Motion for Summary Judgment.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: June 10, 2024

/s/ Stuart Barasch*

(*as authorized via e-mail on June 10, 2024)

STUART BARASCH

Attorney for Plaintiff

9 Dated: June 10, 2024

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

13 By: /s/ Edmund Darcher

EDMUND DARCHER

Special Assistant U.S. Attorney

Attorneys for Defendant

17 **ORDER**

18 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
19 extension, up to and including July 15, 2024, to respond to Plaintiff's Motion for Summary
20 Judgment.

22 Dated: June 14, 2024



DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE